

EXHIBIT F

21 MC 102
In Re: World Trade Center Lower Manhattan Disaster Site Litigation
Summary of Information From Short Form "Check Off" Complaints

A No.	B Plaintiff	C Docket No.	D Alleges Work for Tully or Named Sub- Contractors	E Work for Non-"Tully" Companies	F Job Title	G Work Sites Other than "WTC Site" as Defined in CMO 3	H Alleges Work at DB Building other than from 1/8/02 to 7/1/02
1	Acosta, Byron	07cv1552	No	LVI Environmental Services, Inc.	Handler		Yes
2	Adriano, Luis	07cv4445	No	ETS Contracting and PAL	Asbestos handler	1 Liberty Plaza; Post Office	Yes
3	Agudelo, Gladys	07cv4446	No	Comprehensive Environmental	Asbestos cleaner	1 Federal Plaza; 100 Church Street; 70 Pine Street; 75 Park Place; High School of Economics and Finance	No
4	Ali, Enrique	07cv1554	No	PAL Environmental Safety	Supervisor	1 Liberty Plaza	Yes
5	Allivar, Raul	05cv9821	No	PAL Environmental Safety	Handler	150 Broadway; 1 Liberty Plaza; Post Office (90 Church Street)	Yes
6	Alvarez, Maria	05cv10135	No	Kiss Construction and PAL	Handler	90 Trinity Place; High School of Economics & Finance; Post Office; Stuyvesant High School	Yes
7	Alvarracin, Jose	07cv1556	No	Pinnacle Environment	Asbestos handler	Post Office	Yes
8	Arsenault, Kirk	04cv5338	Yes: Manfort Brothers	None	Burner		Yes
9	Ascencio, Ivan	07cv1460	No	ETS Contracting	Laborer- asbestos	High School of Economics & Finance	Yes
10	Atiencia, Marcelo	07cv1562	No	LVI Environmental Services, Inc.	Handler	Stuyvesant High School	Yes
11	Bailon, Peter	07cv5336	No	Pinnacle Environmental Corp.	Supervisor	Post Office	Yes
12	Barahona, Jose	07cv5550	No	Pinnacle Environmental Corp. and Trade Winds Environmental Restoration	Handler	100 Church Street	Yes
13	Betancourt, Hector	07cv4453	No	ETS Contracting, Inc. and PAL Environmental Safety	Handler	1 Liberty Plaza	Yes
14	Burgos, Leopoldo	07cv1473	No	PAL Environmental Safety	Handler		Yes

21 MC 102

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15	Caguana, Manuel	06cv11968	Yes: EROC	None	Laborer		Yes
16	Calero, Ivan	07cv1575	No	PAL Environmental Safety	Shop steward		Yes
17	Calle, Wilson	07cv1578	No	Pinnacle Environment	Asbestos handler	Post Office	Yes
18	Campoverde, Rey R.	07cv5280	No	PAL Environmental Safety	Handler	Post Office	Yes
19	Campozano, Esther	07cv4459	No	Pinnacle Environment	Asbestos handler		Yes
20	Cardenas, Edison	07cv1580	No	PAL Environmental Safety	Handler	Millenium Hilton Hotel	Yes
21	Castillo, Silvia	05cv1718	No	Branch	Handler		Yes
22	Chuva, Nancy	07cv1589	No	Trio Asbestos	Asbestos handler	Post Office	Yes
23	Cintrón, Yolanda	06cv5631	No	CES	Asbestos handler	160 Water Street; Stuyvesant High School	Yes
24	Cortez, Jorge E.	07cv5394	No	Galt John Corp.	Handler		Yes
25	Cortijo, Lidia	07cv317	No	LVI Environmental Services, Inc., PAL Environmental Safety and Pinnacle Environmental Corp.	None	101 Barclay Street; 4 Albany Street; Hudson View East	Yes
26	Criollo, Nancy	07cv4462	No	PAL Environmental Safety	Cleaner	1 Liberty Plaza	Yes
27	Dota, Clara	07cv1602	No	Asbestos Lead and Hazardous Materials Laborers	Asbestos handler	Post Office; Equitable Building	Yes
28	Drake, Jesse	07cv5353	No	Nastasi Eurotech	Carpenter		Yes

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29	Drozdz, Stanislaw	06cv14620	No	Pinnacle, Trade Winds, Trio Asbestos	Asbestos handler	101 Barclay Street; 111 Wall Street; 140 Broadway; 70 Pine Street; Gillespi Building; Hudson View East; Parc Place; Stuyvesant High School	Yes
30	Duarte, Inerva	07cv1603	No	Safeway Construction, Inc. and Safeway Environmental Corp.	None		Yes
31	Dutan, Elvia	07cv1606	No	Pinnacle Environment	Office cleaner/ handler	Post Office	Yes
32	Encalada, Jorge	07cv1607	No	PAL Environmental Safety and Pinnacle Environmental Safety	Handler		Yes
33	Franco, Luis	07cv4466	No	PAL Environmental Safety	Handler		Not Provided
34	Frelas, Janina	07cv1612	No	ETS Contracting, Inc. and Safeway Environmental Corp.	Asbestos handler and handler	233 Broadway	Yes
35	Gallardo, Norbeto	07cv5290	No	Pinnacle Environmental Corp.	Handler		No
36	Garcia, Viviana	07cv1617	No	Comprehensive Environmental	Asbestos handler	Jacob K. Javits Federal Building	Yes
37	Gaspar, Peter	05cv10739	No	ETS Contracting, PAL, Pinnacle	Supervisor and asbestos	Post Office	Yes
38	Gawin, Leonard	07cv1619	No	PAL Environmental Safety, Safeway Environmental Corp., and Trade Winds Environmental Restoration FDNY	Asbestos handler	101 Barclay Street; 170 Broadway; 76 Varick Street; 95 Maiden Lane	Yes
39	Giamo, Samuel T.	06cv11676	No		Firefighter		Yes

21 MC 102

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40	Giraldo, Hitien E.	07cv5554	No	PAL Environmental Safety	Handler		Yes
41	Gualpa, Rosa	07cv4472	No	Pinnacle Environmental Corp.	Asbestos cleaning	170 Broadway	Yes
42	Guzman, Armando	07cv5556	No	Branch	Asbestos worker		Yes
43	Hernando, Nidia	07cv4473	No	Pinnacle Environment	Handler asbestos		Yes
44	Hurtado, Julio	07cv5295	No	Kiss Construction, Inc., LBI-ABAS, Locat 78, PAL Environmental Safety, Pinnacle Environmental Corp.	Not Provided	63 Wall Street; 90 Chambers Street; P. S. 234 Independence School; West Street Building	Yes
45	Idrovo, Manuel	07cv1628	No	Local 78	Cleaner	Post Office	Yes
46	Idrovo, Edgar	07cv1627	No	Pinnacle Environment	Asbestos cleaner		Yes
47	Inga, Jorge	07cv1629	No	LVI Environmental Services, Inc.	Handler	Post Office; West Street Building	Yes
48	Jablonski, Jozef	07cv1630	No	PAL Environmental Safety and Trade Winds Environmental Restoration	Asbestos handler	Post Office	Yes
49	Jaramillo, Jonas	06cv14746	No	Branch, PAL Environmental Safety, Pinnacle Environmental handler Corp., Trade Winds Environmental Rest.	Asbestos handler	100 Church Street	Yes
50	Karus, Marian	07cv1635	No	LVI Environmental Services, Inc., PAL Environmental Safety, and Pinnacle Environmental Corp.	Asbestos handler and handler	P. S. 89	Yes

21 MC 102

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51	Kosowski, Edward	07cv5299	No	PAL Environmental Safety, and Trade Winds Environmental Rest.	Asbestos handler	100 Church Street; 101 Barclay Street; 160 Water Street; 1 Liberty Plaza; Post Office; P.S. 234 Independence School	Yes
52	Lascano, Ana	05cv9333	No	PAL Environmental	Cleaner	150 Broadway; 1 Liberty Plaza; Post Office	Yes
53	Lasica, Andrzej	07cv4480	No	PAL Environmental Safety, Pinnacle Environmental Corp.	Asbestos handler	High School of Economics & Finance; Hudson View East; Sytuvesant High School	Yes
54	Lenis, Carlos	06cv10045	No	CES	Supervisor		Yes
55	Leon, Ines	07cv4481	No	PAR Environmental Corp., and Pinnacle Environmental Corp.	Not Provided	90 Trinity Place; High School of Economics & Finance; Post Office; P.S. 234 Independence School	No
56	Leon, Cesar	07cv63	No	Safeway Environmental Corp.	Handler		Yes
57	Loja, Wilmo	07cv4482	No	Pinnacle Environment	Handler		Yes
58	Lucero, Fernando	07cv5366	No	Pinnacle Environmental Corp.	Handler	55 Water Street; Post Office	Yes
59	Medina, Rosa	07cv4491	No	TBP	To be supplied	Post Office	Yes
60	Melendez, Maria	07cv5397	No	PAL Environmental Safety	Handler		Yes
61	Mendez, Juan	07cv1664	No	Local 78	Asbestos handler	One Liberty Plaza	Yes
62	Merchan, Carlos	07cv1665	No	Pinnacle Environment Corp.	Asbestos handler		Yes
63	Mora, Eugenio	06cv13168	No	PAL Environmental Safety	Cleaner	100 Church Street; Post Office; Sytuvesant High School	Yes
64	Morales, Tatiana	07cv5370	No	Pinnacle Environment Corp.	Asbestos handler	Post Office	Yes

21 MC 102

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65	Moreno, Sandra	07cv1670	No	LVI Environmental Services, Inc. and Trio Asbestos	Not Provided		Yes
66	Naranjo, Luis	05cv10738	No	Local 78, LVI Environmental Services, Inc., PAL Environmental Safety, Pinnacle Environmental	Cleaner and cleaner/ asbestos handler	Hudson View East; 1 Liberty Plaza; Post Office; Stuyvesant High School	Yes
67	Naranjo, Walter	07cv4496	No	Pinnacle Environment	Cleaner	25 Broadway; 90 Trinity Place; High School of Economics and Finance; Hudson View East; P.S. 234 Independence School; Stuyvesant High School	Yes
68	Negrete, Oscar	07cv5371	No	PAL Environmental Safety	Handler	233 Broadway	Yes
69	O'Connell, Sean	07cv5374	No	Volunteer	Volunteer		To be provided
70	Palaguachi, Rosa	07cv1680	No	Branch	Asbestos cleaner		Yes
71	Reynolds, David	07cv3446	No	Nastasi Eurotech	Carpenter	10 Liberty Street; American Stock Exchange; West Street Building	Yes
72	Rhoden, Marcel	07cv5311	No	Site Safety, LLC	Safety manager		Yes
73	Riera, Maximo	07cv1519	No	Comprehensive Environmental	Handler		Yes
74	Rodas, Patricio	07cv1694	No	Pinnacle Environmental Corp.	Handler	Post Office	Yes
75	Rojas, Jaime	07cv4511	No	Pinnacle Environmental Corp.	Asbestos handler	100 Church Street; Millenium Hilton Hotel; Post Office	Yes

21 MC 102

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76	Romaniuk, Mieczyslaw	07cv5316	No	LVI Environmental Services, Inc., PAL Environmental Safety, Pinnacle Environmental Corp., Safeway	Asbestos handler	1 Federal Plaza; 1 Wall Street; 100 Church Street; High School of Economics and Finance; Hudson View East	Yes
77	Salazar, Victor	07cv4512	No	Pinnacle Environmental Corp.	Handler	Hudson View East	Yes
78	Sanchez, Rosa	06cv12488	No	TBP	TBP		Yes
79	Sanchez, Edilberto	07cv5384	No	PAL Environmental Safety	Asbestos handler		Yes
80	Santamaria, Emanuel	07cv1528	No	PAL Environmental Safety	Handler		Yes
81	Sarmiento, Galo	07cv1529	No	PAL Environmental Safety	Handler	20 Broad Street; 55 Water Street; West Street Building	Yes
82	Sarmiento, Edwin	07cv4515	No	Kiss Construction, Inc.	Asbestos handler	160 Water Street 24 Broadway; 63 Wall Street; 90 Trinity Place; High School of Economics and Finance (100 Trinity Place); Hudson View East; 1 Liberty Plaza; Post Office; Stuyvesant High School; P.S. 234 Independence School	Yes
83	Serrano, Theresa	05cv8937	No	PAL Environmental Safety	Handler		Yes
84	Siguencia, Raul	07cv1533	No	Pinnacle Enviromenal Corp.	Handler		Yes
85	Suarez, Felipe	07cv1707	No	Pinnacle Enviromenal Corp.	Asbestos handler		Yes
86	Sumba, Samuel	07cv1710	No	Pinnacle Enviromenal Corp.	Handler	63 Wall Street; Hudson View East; Stuyvesant High School; The Equitable Building	Yes
87	Tamayo, Pedro	07cv1538	No	Pinnacle Enviromenal Corp.	Cleaner	101 Barclay Street	Yes

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88	Teham, Nicholas	07cv5564	No	Regional Scaffolding	Carpenter		Yes
89	Tenezaca, Julia	07cv1714	No	Pinnacle Enviromenal Corp.	Handler		Yes
90	Teran, Cesareo	07cv5389	No	Comprehensive Environmental	Handler		Yes
91	Thorpe, Jeanne	07cv1715	No	PAL Environmental Safety	Asbestos handler	Trinity Church	Yes
92	Valencia, Carlos A.	07cv5324	No	Maxons Restoration, Inc.	Cleaner	100 Church Street; 100 Gateway Plaza; 101 Barclay Street; 200 Gateway Plaza; 400 Gateway Plaza	Yes
93	Vasquez, Rommel	07cv1543	No	PAL Environmental Safety	Handler	Stuyvesant High School	Yes
94	Vazquez, Kattia	07cv1722	No	PAL Environmental Safety	Asbestos handler	Post Office	Yes
95	Vega, Severo	07cv4521	No	PAL Environmental Safety	Handler	1 Liberty Plaza	Yes
96	Villarreal, Segundo	07cv1546	No	PAL Environmental Safety	Handler	Stuyvesant High School	Yes
97	Villarruel, Kleber	06cv13703	No	PAL Environmental Safety	Foreman	1 Liberty Plaza	Yes
98	Walsh, Kevin	06cv12608	No	Nastasi Eurotech	Carpenter		Yes
99	Waniurski, Robert	07cv4524	No	LVI Environmental Services, Inc., PAL Environmental Safety, and Pinnacle Environmental Corp.	Asbestos handler	30 Rockefeller Plaza	Yes
100	Watson, Ancil	07cv5391	Yes: Tulley's [sic] Construction Company	None	Laborer		Yes
101	Wragg, Clarence	06cv8125	No	Trade Winds Environmental Restoration	Asbestos worker		Yes

EXHIBIT G

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1

1 76FVWORC Conference
1 UNITED STATES DISTRICT COURT
1 SOUTHERN DISTRICT OF NEW YORK
2 -----X
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3 IN RE: WORLD TRADE CENTER
3
4 LOWER MANHATTAN DISASTER 21 MC 102 (AKH)
4
5 SITE LITIGATION
5
6 -----X
6 New York, N.Y.
7 June 15, 2007
7 1:05 p.m.
8
8 Before:
9
9 HON. ALVIN K. HELLERSTEIN,
10 District Judge
10
11 APPEARANCES
11
12 WORBY GRONER EDELMAN & NAPOLI BERN LLP
13 Attorneys for Plaintiffs
13 BY: WILLIAM H. GRONER
14 MARC J. BERN
14 WILLIAM J. DUBANEVICH
15 -AND-
15 GREGORY J. CANNATA & ASSOCIATES
16 BY: GREGORY J. CANNATA
16 -AND-
17 ROBERT A. GROCHOW PC
17 BY: ROBERT A. GROCHOW
18
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25

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2

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2 APPEARANCES (cont'd.)
2 PATTON BOGGS LLP
2 Attorneys for Defendant City of New York
3 BY: JAMES E. TYRRELL, JR.
3 JOSEPH E. HOPKINS
4
4 FLEMMING ZULACK WILLIAMSON ZAUDERER LLP
5 Attorneys for Defendant Silverstein Properties, Inc.
5 BY: THOMAS A. EGAN
6
6 KIRKLAND & ELLIS LLP
7 Attorneys for Defendant Verizon New York
7 BY: LEE ANN STEVENSON
8
8 STERN TANNENBAUM & BELL LLP

Page 1

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3 worked out, Napoli Bern firm needs to perform a check-off
 4 complaint which is commensurate with the one that was finalized
 5 by liaison counsel for plaintiffs in the 102 docket.

6 MR. CANNATA: Your Honor, part of the difficulty that
 7 we have is is that the Court's order required the complaints to
 8 be filed before they were finalized. And that was part of the
 9 difficulty.

10 However, I understand that there are no firemen and
 11 policemen plaintiffs in this docket. And if you recall the
 12 last conference, we addressed this issue and you ordered that
 13 the 205(e) claims should be taken out. And that's what we did.
 14 And as far as I know, there aren't any --

15 THE COURT: So if they are still in, I guess they'll
 16 be fixed up.

17 MR. CANNATA: It's not a problem, Judge. There are no
 18 plaintiffs that are claiming that basis for a suit.

19 THE COURT: Mr. Hopkins. Again, I don't have a basis
 20 to resolve that. There's a substantive point here. The point
 21 is that a fireman and a policeman are not allowed to sue the
 22 City, I guess, for damages where they can recover the analog to
 23 workmen's compensation. That's the point, isn't it?

24 MR. CANNATA: No, Judge, that's incorrect.

25 THE COURT: Incorrect.

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14

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1 MR. CANNATA: You're incorrect by that. A fireman and
 2 policeman can sue the City, but they have to allege a specific
 3 violation of law, a rule. But as far as I know, there are no
 4 plaintiffs -- they do have some. I'm being told they do have a
 5 couple. So, Judge, they have to straighten that out.

6 THE COURT: What's the situation?

7 MR. DUBANEVICH: Your Honor, William J. Dubanevich.
 8 We do have firefighters and police officers who are in the 102
 9 classification. And that is why we had to allege violations of
 10 the General Municipal Law.

11 THE COURT: So what do you want me to do, Mr. Hopkins?

12 MR. HOPKINS: Well, after all the Sturm und Drang that
 13 we've had to get to this point to try to finalize pleadings, we
 14 now have master complaint filed which does not include
 15 allegations regarding General Municipal Law.

16 We have check-off complaints from Cannata and Grochow
 17 that don't make reference to that because it's not there. But
 18 now, and really, I think, for the first time we're hearing from
 19 the Napoli Worby Groner firm that they do have allegations to
 20 make under those provisions, and they are not in the master
 21 complaint. So their check-off complaint refers back to the
 22 master complaint that doesn't contain those types of claims.

23 THE COURT: So the first assertion of the claim is the
 24 check-off complaint, and presumably you're going to move to
 25 dismiss them because of the issue of limitations.

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15

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1 MR. HOPKINS: Undoubtedly. And I'm sure other
 2 substantive reasons, as well.

3 THE COURT: Like what? Just to give me a heads-up.

4 MR. HOPKINS: I've not looked at the check-off
 5 complaints, so I can't speak to whatever the clients are. But
 6 as to whether that is a proper vehicle for whoever these
 7 people -- these plaintiffs may be; whether they can rely upon

Page 7

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8 this provision in the General Municipal Law to make such a
 9 claim or not. It goes beyond any type of statute-type issue.
 10 THE COURT: I'm not familiar with the law. I don't
 11 know what it is. But I'll take the statement from Mr. Cannata
 12 as expressing the law that if the City has violated a law that
 13 firemen and policemen can sue. You know, all this makes my
 14 head kind of swim. And I guess it begs the definition of
 15 what's involved in the 102 and later the 103 cases.
 16 Forgetting about the technical definition of the world
 17 Trade Center, the way I looked at this is that 100 were the
 18 cases that were focused mainly against the City, because the
 19 Department of Design and Construction took the lead in the
 20 cleanup of the world Trade Center.
 21 102 were cases where there were private or public
 22 homeowners independent of the Department of Design and
 23 Correction, to the Department of Design and Construction.
 24 And 103 is where plaintiffs did some work under the
 25 jurisdiction of the DDC and other work under the jurisdiction
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16

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1 of private and public property owners. That's how I looked at
 2 it. I don't know if that's realistic or not.
 3 MR. CANNATA: Your Honor, that's our position, as the
 4 Court just expressed. However, when you issued the order for
 5 103, we believe you made an error, and you went to the earlier
 6 definition, the 100 definition, of what the world Trade Center
 7 site was.
 8 THE COURT: I did?
 9 MR. CANNATA: You inadvertently did that. And you did
 10 that --
 11 THE COURT: It was the only definition that was at
 12 hand. Let me just tell you this: I thought, and let me expose
 13 my thinking so that if it's wrong, I want to know it's wrong.
 14 I thought that DDC was in control of the cleanup
 15 operations with regard to all the property identified in that
 16 first order. And I think I took that definition from the
 17 Victims Compensation Fund. I don't remember exactly where I
 18 took it from, but I think I took it from there. And that may
 19 be the cause of the problem, I don't know. And I don't know
 20 what is feasible here.
 21 MR. CANNATA: Well, the practical effect of it is,
 22 Judge, that by using the definition from 100 that you used that
 23 was made before 102 was created, you've essentially put almost
 24 all of the plaintiffs from 102 back into the 100 case and thus,
 25 the 103 case.

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17

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1 THE COURT: I didn't intend that.
 2 MR. CANNATA: I know you didn't intend it, Judge. But
 3 I'm just telling you, for example, with our cases, I have our
 4 45 or so plaintiffs, we would end up with about 35 of them into
 5 103, and only a handful, eight or nine or ten, in 102. And I
 6 don't think that's what the Court intended.
 7 THE COURT: No, it's not what I intended. I also
 8 raised the issue of the lead counsel issues with regard to 102
 9 and 103. Because it was my conception that the 102 case had
 10 involved lawsuits against others in the City through DDC. And
 11 therefore, I thought it not particularly appropriate that the
 12 same plaintiffs' lawyers are the same defendants' lawyers be

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13 functioning on 102. And I've never really resolved that issue.

14 Mr. Tyrrell.

15 MR. TYRRELL: Your Honor, I'd like to jump an issue
16 back, as we've moved ahead to the issue of whether there should
17 be broader representation at the level of the liaison, not
18 lead, but liaison counsel. I'd like to speak to that later,
19 but I'd like to respond to Mr. Cannata's point.

20 We have been operating for more than two years now
21 with a particular definition that was born in the 100 docket
22 that your Honor created as to what was the geographic area, the
23 16 acres covered by that docket. But it is not true when you
24 created 102, you'll remember we objected to it at that time, we
25 said, Don't bother breaking them up; keep them altogether.

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18

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1 we're over that. But when you created 102, you took the
2 reciprocal of that definition; you said other things --

3 THE COURT: That's right.

4 MR. TYRRELL: -- in that 16 acres.

5 THE COURT: That's right.

6 MR. TYRRELL: Now, that made great sense. Because
7 whether the claim occurred in lower Manhattan or occurred, as
8 Mr. Cannata says, here in this courthouse, and frankly, I think
9 the only one in this courthouse who possibly got sick is your
10 Honor for working too hard on the case. But that's a different
11 kind of claim.

12 THE COURT: I need a remedy.

13 (Laughter)

14 MR. TYRRELL: You need a remedy. I think it's more
15 than over-the-counter, your Honor. If we go back now and
16 change, so I'm now focused exactly on that issue --

17 THE COURT: My wife said retire. I said the case will
18 follow me.

19 (Laughter)

20 MR. TYRRELL: If we go there now, okay, we're going to
21 ditch all of the definitions and organizational stuff that we
22 had. But then when you look at what Mr. Cannata proposes in
23 his letter, which is something that is supposed to be better,
24 and of course, you said nobody's substantive rights is going to
25 be affected by this. This is just to help get it organized.

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19

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1 His definition will turn on whether the City of New
2 York is a defendant in each case. That makes no sense
3 whatsoever.

4 So in his definition, someone who worked on the pile
5 and sued only Tully, it would no longer be a 100 case, because
6 the City of New York would have to be in it, according to his
7 proposed --

8 THE COURT: If someone worked on the pile and worked
9 for Tully --

10 MR. TYRRELL: And didn't sue New York, too, it
11 wouldn't any longer be a 100 case.

12 THE COURT: well, who would he sue?

13 MR. TYRRELL: I don't know. It's amiss.

14 MR. CANNATA: I didn't say that, Judge.

15 MR. TYRRELL: We don't need to change this.

16 MR. CANNATA: Judge, excuse me. I didn't say that in
17 my letter. I said outside on the mound.

Page 9

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18 THE COURT: Stop. Stop. What's the justification of
 19 having a different collection of cases in 102 from what I have
 20 in 100? I'll answer it. It's because it's a different
 21 defendant.

22 The City, except as an owner of property, is not
 23 involved. The violations alleged of the labor law were by the
 24 managers and owners of the specific properties. I mean, folks,
 25 that's what I had in mind.

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20

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Conference

1 MR. TYRRELL: And your Honor, at this point we're not
 2 suggesting we change that.

3 THE COURT: The definition.

4 MR. TYRRELL: It is Mr. Cannata who is suggesting --

5 THE COURT: My definition.

6 MR. TYRRELL: -- that your definition be changed. So
 7 now if someone worked, and let's take the Deutsche Bank
 8 building as an example. It was under the control, we believe,
 9 of the DBS for the cleanup. It was completely -- it wasn't not
 10 banned, it was destroyed.

11 THE COURT: DBS?

12 MR. TYRRELL: I'm sorry, Department of Design and
 13 Construction.

14 THE COURT: I don't think sanitation was involved.

15 MR. TYRRELL: Right. Now, that building was never
 16 reoccupied, okay. So as to that building, if you now took his
 17 definition and transferred that out because it was originally a
 18 private building, we would be creating yet more confusion.

19 THE COURT: I think DDC was involved with Deutsche
 20 Bank.

21 MR. TYRRELL: That's why it should stay in 100.

22 THE COURT: That's why Verizon is in 100 also.

23 MR. TYRRELL: And you've already ruled on those
 24 applications as to Verizon, and I know Verizon's counsel wants
 25 to speak to that. But if you followed Mr. Cannata's suggestion

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1 now, all of the Verizon cases and the Verizon building would
 2 move to the 102 docket.

3 THE COURT: I've taken the position throughout that
 4 substantive rights should not be affected by how I categorize
 5 the case. Because I never really felt confident in my
 6 definitions. And I didn't want substantive rights to be
 7 affected by it.

8 It was my impression that Deutsche Bank, which is
 9 across the street from is it One or Two World Trade Center, was
 10 treated like it was part of the World Trade Center in terms of
 11 the cleanup operations. But the buildings on Rector Street, to
 12 draw an example, two blocks away, three blocks away, I don't
 13 remember exactly, should not be in the same category as the
 14 World Trade Center.

15 Now, you ask what about the buildings in between, the
 16 church, for example, across the street, the other way to the
 17 World Financial Center. The World Financial Center is in the
 18 definition, I see. I don't know why. I guess DDC functioned
 19 there, so maybe that's why.

20 MR. TYRRELL: One of the reasons is debris fell into
 21 those buildings, structural debris that was the same type
 22 that's being cleaned up on the ground fell over and went right

Page 10

23 76FVWORC.TXT
24 into the Deutsche Bank building.
25 THE COURT: You know, I don't really care, except to
the extent that the category is driving a different result from
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0 22
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1 that which we normally obtain. And I need to be alerted to
2 that when it happens.
3 why I challenge your leadership, Mr. Tyrrell, it's not
4 because I don't admire your leadership. And I will tell you
5 very candidly, although we've had our differences in these
6 cases, one way that I've been able to administer the cases is
7 because of the hard work that you and Mr. Hopkins and your
8 other colleagues have put into this case. I'm indebted to you.
9 And I have no doubt but that 102 and 103 will benefit from your
10 leadership, as well.
11 But what I'm bothered by is that as I look at these
12 cases, DDC was not involved. And it should not be taken to
13 task for providing masks or not providing masks, or giving
14 education or not giving education. If that's the case, why are
15 you involved? Why do you care, except as a friend of the
16 Court. I'm glad to have your friendship, but there's a
17 conflict issue.
18 MR. TYRRELL: I'll tell you why I care, and then I'll
19 tell you why you shouldn't worry about it. Okay?
20 THE COURT: Okay.
21 MR. TYRRELL: First, I care because according to my
22 colleagues over here, the City of New York in the 102 docket is
23 currently in 65 to 95 actions. I am their counsel.
24 THE COURT: As owner?
25 MR. TYRRELL: We don't have the specific complaints
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0 23
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1 yet, but we assume so, yes. As either a tenant or an owner,
2 yes, in 65 to 95 of those actions. And is in a whole bunch of
3 actions that will be in that status in the 103 docket, as well.
4 THE COURT: By all means you have to be in the case,
5 but there have to be others.
6 MR. TYRRELL: We completely agree with that, let me
7 tell you the --
8 THE COURT: No one is stepping up.
9 MR. TYRRELL: Well, that's the problem. But let me
10 tell you why you don't have to be concerned about the thing you
11 put in your order, which is the issue of conflict. why?
12 Because when you serve as liaison counsel, the general law is
13 it isn't a conflict; your duty of loyalty still runs to your
14 client. You have a duty to the Court and everybody else to
15 serve as liaison --
16 THE COURT: I accept that, Mr. Tyrrell, as long as
17 there are others in the group to protect different interests.
18 MR. TYRRELL: Couldn't agree with you more. But one
19 last point, because I went and looked it up. You, very
20 smartly, in the order you entered when you created liaison
21 counsel, specifically said in CMO No. 2 way back when that
22 there would be no conflicts by serving in that position.
23 So only the issue you have now addressed is the right
24 issue, which is would some other people please step up so that
25 there is a broad enough representation.
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Page 11

EXHIBIT H

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August 1, 2007

Via Electronic Mail

Hon. Alvin K. Hellerstein, U.S.D.J.
United States District Court for the Southern
District of New York
500 Pearl Street, Room 910
New York, New York 10007

Re: Kirk Arsenault, et al. v. Tully Construction Co., Inc., Tully Industries Inc., and
Deutsche Bank, Docket No. 04-cv-5338 (AKH)

Dear Judge Hellerstein:

Counsel for the parties in the above-captioned action hereby submit this joint letter to request the Court's determination of the defendants' request to transfer this action from the 21 MC 102 docket to the 21 MC 100 docket.

Defendants' Position:

Counsel for Tully Construction Co. Inc. and Tully Industries, Inc. ("Tully") respectfully requests the transfer of the above-captioned action (the "*Arsenault* action") from the 21 MC 102 docket to the 21 MC 100 docket. Co-defendant Deutsche Bank Trust Company Americas ("Deutsche Bank") does not object to Tully's request under the circumstances presented here.

Plaintiffs' counsel Robin Wertheimer, Esq. represents three plaintiffs in actions allegedly arising out of those plaintiffs' work allegedly related to the rescue, recovery and debris removal efforts following the collapse of the World Trade Center ("WTC") on September 11, 2001. Those plaintiffs are Kirk Arsenault, Steven Zablocki and Richard Racioppi. The latest version of the *Arsenault* complaint (filed October 13, 2004) (currently

Hon. Alvin K. Hellerstein, U.S.D.J.
 August 1, 2007
 Page 2

pending in the 21 MC 102 docket) encompassed claims brought by two plaintiffs: Kirk Arsenault and Steven Zablocki. Mr. Zablocki's claims apparently were subsequently severed from the *Arsenault* action on December 26, 2006, when a separate individual complaint was filed in Mr. Zablocki's name under Civil Action No. 06-cv-15494 (the "*Zablocki* action"). The *Zablocki* action thereafter was docketed in 21 MC 100. Despite the apparent severance of Mr. Zablocki's claims from the *Arsenault* action, however, plaintiffs' counsel has not filed any amended pleading in the *Arsenault* action to reflect such severance. Furthermore, plaintiffs' counsel has failed to file a check-off complaint in the *Arsenault* action (notwithstanding the Court's prior order that check-off complaints for all actions in 21 MC 102 were to be filed by June 14, 2007).¹

Plaintiffs' counsel Ms. Wertheimer previously wrote the Court to request the transfer of the *Zablocki* action from the 21 MC 100 docket to the 21 MC 102 docket. Defendants' counsel were never copied on plaintiffs' counsel's communication to the Court. Responding to plaintiffs' counsel's request, the Court ruled that the *Zablocki* action should "remain classified as related to 21 MC 100, and remain subject to the Second Circuit's stay." (April 13, 2007 Order Denying Motion to Transfer Dockets, Docket No. 06-cv-15494, 21 MC 100 (AKH)) (the "*Zablocki* Order"). Specifically, the Court indicated that plaintiff Zablocki's request to transfer his case from 21 MC 100 to 21 MC 102 was denied on the grounds that his complaint alleged that he worked at the Deutsche Bank building at 130 Liberty Street which is "considered part of the World Trade Center site, as defined in Case Management Order No. 3, 21 MC 100 (Feb. 7, 2005)."² The Court also denied plaintiff Zablocki's transfer request

¹ The action of plaintiff Richard Racioppi, captioned *Richard Racioppi v. Tully Construction Co., Inc., Tully Industries Inc., and Deutsche Bank*, Index No. 112407/04 (latest complaint dated October 13, 2004), is not the subject of this joint letter as plaintiffs' counsel has indicated that the *Racioppi* action shortly will be voluntarily dismissed or withdrawn. If that understanding is incorrect in any way, then Tully respectfully requests, without objection from Deutsche Bank, that the *Racioppi* action also be transferred from the 21 MC 102 docket to the 21 MC 100 docket for the reasons set forth herein. Although the *Racioppi* action (like the *Arsenault* action) currently is docketed in 21 MC 102, no check-off complaint has been filed in the *Racioppi* action.

² Deutsche Bank does not concede that the definition of the World Trade Center site in CMO 3 is necessarily dispositive of Tully's request. In Deutsche Bank's view, it is the nature of a given plaintiff's work, not just the location, that should dictate whether the case is designated to 21 MC 100 or 21 MC 102. However, the parties need not debate that issue in the present application because the type of work performed by Arsenault, Zablocki, and Racioppi, on behalf of a City contractor, militates in favor of their designation to 21 MC 100.

Hon. Alvin K. Hellerstein, U.S.D.J.
 August 1, 2007
 Page 3

because defendant Tully is one of the contractors of the City of New York involved in the 21 MC 100 docket and is one of the contractors involved in the interlocutory appeal to the Second Circuit which resulted in a stay of all 21 MC 100 proceedings. *See Zablocki Order.*

Just like the *Zablocki* action, the *Arsenault* action belongs in the 21 MC 100 docket and should be transferred there and stayed. The allegations of plaintiff Arsenault are identical to those of plaintiff Zablocki. *Compare Kirk Arsenault et. al. v. Tully Construction Co., Tully Industries Inc., and Deutsche Bank*, Index No. 04 CV 5338 at ¶¶ 11, 14 ("*Arsenault Complaint*") with *Steve Zablocki v. Tully Construction Co., Inc., Tully Industries Inc., and Deutsche Bank*, Index No. 06-CV-15494 at ¶¶ 11, 14 ("*Zablocki Complaint*").³ Plaintiffs' counsel has indicated that plaintiffs Arsenault and Zablocki worked side-by-side in the Deutsche Bank building.⁴ Both plaintiffs⁵ have brought suit against Tully and Deutsche Bank for the WTC-related work in which they allegedly were involved. *Compare Arsenault Complaint* at ¶¶ 4, 6, 40 with *Zablocki Complaint* at ¶¶ 4, 6, 45. And finally, both plaintiffs⁶ Arsenault and Racioppi allege that they were employed by Manfort Brothers Inc., a subcontractor of Tully, and worked doing debris removal and cleanup work in the Deutsche Bank building. *Compare Arsenault Complaint* at ¶ 11 with *Zablocki Complaint* at ¶ 11. Manfort Brothers, Inc. conducted this work as a subcontractor to Tully who was working as one of the City of New York's contractors in the rescue, recovery and debris removal effort.

Given the identical nature of the *Arsenault* and *Zablocki* claims and for the reasons already articulated by the Court in the *Zablocki Order*, Tully respectfully requests that the *Arsenault* action be transferred from the 21 MC 102 docket to the 21 MC 100 docket. Should the Court require that a formal motion be filed seeking this result, Tully respectfully requests the opportunity to promptly file such motion upon request of the Court. Although Tully is protected by a current stay from the Second Circuit, we respectfully request that the time to respond to the Master Complaint be extended with respect to Defendants during the pendency

³ And the allegations of plaintiff Racioppi are the same. *See, e.g., Racioppi Complaint* at ¶¶ 13, 16.

⁴ With plaintiff Racioppi. *See id.* at ¶ 16.

⁵ And Racioppi. *See id.* at ¶ 7.

⁶ And Racioppi. *See id.* at ¶ 13.

Hon. Alvin K. Hellerstein, U.S.D.J.
August 1, 2007
Page 4

of this letter request to avoid prejudice should the Court disagree with respect to the relief requested herein.

Plaintiffs' Position:

Plaintiff Kirk Arsenault objects to the proposed transfer of his case from its present docket. The defendants' proposal is highly prejudicial and, under its own reasoning, entirely unfounded.

Plaintiffs Arsenault and Zablocki, working side by side, were employed by Manfort Brothers, a sub contractor of Tully, to dismantle the Deutsche Bank building at 130 Liberty Street in the aftermath of September 11. These men were employed in the fairly unique job of "burners" or, burning the steel of the building in such a way as to control its demolition. In the course of this employment, they were exposed to molds and other toxins which have caused them serious injuries. Their employ commenced on or about October 15, 2001.

In 2004, Arsenault and Zablocki brought one complaint under, *inter alia*, the labor law. It was filed in the Southern District on diversity grounds because these men reside in Massachusetts. As the docket illustrates, it was moved from Judge Kram, to Judge Cedarbaum to Judge Castel, then a pretrial conference was held before Judge Casey before it went to Judge Daniels, and it finally landed, despite plaintiffs' objections, with the World Trade Center cases. However, were it to be designated a World Trade Center case, it was more properly designated as an off-site case, in 21 MC 102.

The reasoning given by the defendants in this letter do not justify a reassignment of this case to the stayed docket. These plaintiffs' type of work does not in any way "militate on favor of their designation to the 21 MC 100 docket". The type of work that they did was not in any way "related to debris removal and clean up work". These quotes are from the defendants' portion of this letter in support of its reasoning. Should the type of work they did be a motivating factor in the reclassification, then defendants' argument must fail because, as mentioned above, their work was to dismantle a building more than a month after the disaster. (As we all know, that job was not completed; the building still stands.)

Plaintiff Zablocki was severed from the joint initial complaint pursuant to the Court's Order that all plaintiffs file separate complaints. Prior to his new complaint being filed, Zablocki had been docketed with Arsenault in 21 MC 102. In severing his complaint from Arsenault's, Zablocki ended up in the 21 MC 100 docket. At a 21 MC 102 conference before Judge Hellerstein, the undersigned requested the Court's guidance as to how to reunite these two plaintiffs in the 21 MC 102 docket. The instruction was to write to Judge Hellerstein and

Hon. Alvin K. Hellerstein, U.S.D.J.
August 1, 2007
Page 5

request that he direct the clerk of court to move Zablocki into the 21 MC 102 docket. Two such requests on behalf of Zablocki were denied.

Plaintiff Arsenault did file a check off complaint in the 21 MC 102 docket in a timely manner. Arsenault has been in the off site docket since its inception. It only makes sense that a worker who worked after October 15, 2001 in a job that entailed strictly demolition be in the 21 MC 102 docket. Defendants have waited until now to try to move this case to the stayed docket because of the error that was promulgated with the Zablocki case after his complaint was separately filed. Defendants have had years to request this transfer, but never did because there was no substance to this request prior to the severance and reassignment of the Zablocki matter.

Given the fact that there is a possibility of the stayed 21 MC 100 cases being dismissed by the Second Circuit Court of Appeals, the prejudice to this plaintiff is immeasurable. As the defendants' portion of this letter suggests, the designations of these dockets are not immutable. In this letter, Tully does not agree with Deutsche Bank as to the definition of the World Trade Center site. But they both agree that the nature of the work has some weight. These defendants then proceed to mischaracterize the nature of the work performed by these plaintiffs as clean up and debris removal. Should this be a deciding factor, then it clearly does not support moving this plaintiff into a docket with such workers and their request must be denied. Furthermore, it seems highly prejudicial to move a plaintiff into a stayed docket at such a late date when the case has not been previously classified as such nor has this plaintiff been given the opportunity to make timely objections on his own behalf (with all respect to, and admiration for, the papers filed on behalf of the plaintiffs in the 21 MC 100 docket).

Hon. Alvin K. Hellerstein, U.S.D.J.
August 1, 2007
Page 6

The request of the defendants to move Kirk Arsenault's case from its present place in the 21 MC 102 docket into the 21 MC 100 docket should be in all respects denied and as the request is based mostly on the reassignment of the Zablocki action, the Court is asked to reconsider its placement of the Zablocki action.

Respectfully submitted,

s/
Mark Weber, Esq.
MOUND COTTON WOLLAN & GREENGRASS
Counsel for Tully Construction Co. Inc., Tully
Industries, Inc.

s/
James E. Tyrrell, Jr., Esq.
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s/
Marc D. Crowley, Esq.
DAY PITNEY LLP
Counsel for Deutsche Bank Trust Company Americas

s/
Robin S. Wertheimer
WERTHEIMER ASSOCIATES, P.C.
Counsel for Plaintiff Kirk Arsenault

EXHIBIT I

21 MC 102

In Re World Trade Center Lower Manhattan Disaster Site Litigation

In Re World Trade Center Lower	Case Number
Byron Acosta	07cv1552
Luis Adriano	07cv4445
Gladys Agudelo	07cv4446
Enrique Ali	07cv1554
Raul Allivar	05cv9821
Maria E. Alvarez and Carlos Chavarriaga	05cv10135
Jose Alvarracin	07cv1556
Kirk Arsenault	04cv5338
Ivan Ascencio	07cv1460
Marcelo Atencia	07cv1562
Peter B Bailon	07cv5336
Jose Barahona and Domenica Barahona	07cv5550
Hector Betancourt	07cv4453
Leopoldo Burgos	07cv1473
Manuel Caguana and Antonia Caguana	06cv11968
Ivan Calero and Reyna Calero	07cv1575
Wilson Calle	07cv1578
Rey R. Campoverde	07cv5280
Rodrigo Campozano	07cv4459
Edison Cardenas	07cv1580
Silvia Castillo and Segundo Castillo	05cv1718
Nancy Chuva	07cv1589
Yolanda Cintron	06cv5631
Jorge E Cortez	07cv5394
Lidia Cortijo	07cv317
Nancy Criollo and Lawrence Zenteino	07cv4462
Clara Dota	07cv1602
Jesse Drake and Susan Drake	07cv5353
Stanislaw Drozd and Monika Drozd	06cv14620
Inerva Duarte	07cv1603
Elvia Dutan and Wilfredo Dutan	07cv1606
Jorge Encalada	07cv1607
Luis Franco	07cv4466
Janina Frelas	07cv1612
Norberto Gallardo	07cv5290
Viviana Garcia	07cv1617
Peter Gaspar	05cv10739
Leonard Gawin and Mirosława Gawin	07cv1619
Samuel T. Giamo and Rosemary Giamo	06cv11676
Hitien E Giraldo	07cv5554
Rosa Gualpa	07cv4472
Armando Guzman	07cv5556
Avenia Hernando and Nidia Hernando	07cv4473
Julio Hurtado and Elda Monica Hurtado	07cv5295
Manuel Idrovo	07cv1628
Edgar Idrovo	07cv1627
Jorge Inga	07cv1629
Jozef Jablonski and Agnieszka Jablonska	07cv1630
Jonas Jaramillo and Blanca Romelo	06cv14746

Plaintiff	Case Number
Marian Karus and Barbara Karus	07cv1635
Edward Kosowski	07cv5299
Ana Lascano	05cv9333
Andrzej Lasica and Ewelina Lasica	07cv4480
Carlos Lenis and Lucia Lenis	06cv10045
Ines Leon and Luis E. Quezada	07cv4481
Cesar Leon and Agnes Dipini	07cv63
Wilmo Loja	07cv4482
Fernando Lucero	07cv5366
Rosa Medina	07cv4491
Maria E. Melendez	07cv5397
Juan Mendez and Kareen Mendez	07cv1664
Carlos Merchan and Martha Merchan	07cv1665
Eugenio Mora and Olga Mora	06cv13168
Tatiana Morales and James Fink	07cv5370
Sandra Moreno	07cv1670
Luis Naranjo and Rosa Naranjo	05cv10738
Walter Naranjo and Miriam Naranjo	07cv4496
Oscar Negrete	07cv5371
Sean O'Connell and Carole O'Connell	07cv5374
Rosa Palaguachi and Rigoberto	07cv1680
David Reynolds and Katherine Reynolds	07cv3446
Marcel Rhoden and Deirdre L. Worley	07cv5311
Maximo Riera and Fanny Riera	07cv1519
Patricio Rodas and Taina Ruiz	07cv1694
Jaime Rojas and Johanna Hernandez	07cv4511
Mieczyslaw Romaniuk	07cv5316
Victor Salazar	07cv4512
Rosa Sanchez and Hector Albarracih	06cv12488
Edilberto Sanchez	07cv5384
Emanuel Santamaria	07cv1528
Gala Sarmiento	07cv1529
Edwin Sarmiento and Nora Sarmiento	07cv4515
Teresa Serrano	05cv8937
Raul Siguencia	07cv1533
Felipe Suarez	07cv1707
Samuel Sumba and Mercedes Sumba	07cv1710
Pedro Tamayo and Gabriella Tamayo	07cv1538
Nicholas Teham	07cv5564
Julia Tenezaca	07cv1714
Cesareo Teran	07cv5389
Jeanne Thorpe	07cv1715
Carlos A. Valencia and Gloria N. Bonilla	07cv5324
Rommel Vasquez and Rosa A. Gomez	07cv1543
Kattia Vazquez and Peter Vazquez	07cv1722
Severo Vega and Lila Gonzalez	07cv4521
Segundo Villarroel and Martha L. Villarroel	07cv1546
Kleber Villarruel	06cv13703
Kevin Walsh	06cv12608
Robert Waniurski and Ewa Waniurski	07cv4524
Ancil Watson	07cv5391
Clarence Wragg and Cecilia Wragg	06cv8125